

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

LEROY WILLIAMS,

Plaintiff,

v.

**STATE OF ALABAMA DEPT. OF
TRANSPORTATION, et. al.**

Defendant.

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**Civil Action No.:
2:06-cv-658-ID**

UNOPPOSED MOTION FOR EXTENSION

Comes now the plaintiff and moves this honorable court for an unopposed twenty-eight day extension of time to file his response to the defendant's summary judgment motion. In support of this motion, plaintiff states as follows:

1) Plaintiff's counsel's mother was hospitalized for surgery late last week. This is her sixth major surgery in the last three years which have all been complicated by a host of other medical problems.

2) Various complications have arisen and she is now expected to be hospitalized for two to three weeks. Mr. Adams is the only available care giver and has been required to be out of the office and will continue to be out of the office on an as needed basis for the next few weeks.

3) The response is currently due on April 10, 2007 and counsel apologizes to the Court for the last minute filing. This is plaintiff's first request for an extension in

this action.

Wherefore, premises considered, plaintiff respectfully requests that this Court extend the due date for his summary judgment response by twenty-eight days or such other extension as the Court should allow.

Respectfully submitted,

Russell W. Adams
Counsel for Plaintiff

OF COUNSEL:

WIGGINS, CHILDS, QUINN & PANTAZIS, LLC
301 19th Street North
Birmingham, Alabama 35203
(205) 314-0500

CERTIFICATE OF SERVICE

I DO HEREBY CERTIFY, that a copy of the foregoing was served via U.S. Mail, first class, postage pre-paid this the 10th day of April, 2007 and addressed as follows:

Jim R. Ippolito
Andrew Redd
Alabama Department of Transportation
1409 Coliseum Boulevard
Montgomery, Alabama 36110

Russell W. Adams
Counsel for the Plaintiff